



United States Attorney
Eastern District of New York

RN:MT:AL:sw
F.#2010R00195
Disc. 27

271 Cadman Plaza East
Brooklyn, New York 11201

October 7, 2011

Via ECF

All Defense Counsel

Re: United States v. Theodore Persico, Jr., et al.
Criminal Docket No. 10-147 (S-2) (SLT)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes the following supplemental discovery with respect to the above-captioned case. The government hereby reiterates its request for reciprocal discovery.

The following documents are available at First Choice Copy. You may obtain a copy of these documents by contacting Joe Meisner at (718) 381-1480 x212, or jmeisner@nyc.rr.com. Please reference print order number **60072**.

1. TITLE III EVIDENCE

DX #	DESCRIPTION	BATES RANGE
257	Disk containing applications and related documents in support of the orders authorizing the interception of communications occurring over a cellular telephone assigned telephone Number 917-439-3395 and 646 208 5577	34750
258	Disk containing relevant recordings made pursuant to order Authorizing the Interception of Communications Occurring Over a Cellular Telephone Assigned Telephone Number 917-439-3395. ¹	34751

¹ Additional relevant calls, as well as a copy of all of the calls recorded pursuant to wire tap applications and orders, will be provided shortly.

DX #	DESCRIPTION	BATES RANGE
259	Applications and related documents in support of the orders authorizing the interception oral communications in the visiting room of the Federal Correctional Facility in Lompoc, California. ²	34752-35050

2. DOCUMENTS AND OTHER TANGIBLE ITEMS

DX #	DESCRIPTION	BATES RANGE
260	A disk containing bank records for Michael Persico	35051
261	Northfork bank records for GFMC, LLC.	35052-35092
262	Phone records for Michael Sciarretta	35093-35107
263	Bank records for Park Plus Valet	35108-35530
264	Local 282 shop steward reports (2005)	35531-35591
265	Local 282 shop steward reports (2009)	35592-35626
266	Business Integrity Commission Documents	35627-35802
267	Disk containing surveillance photographs 9/17/02	35803
268	Disk containing surveillance video 9/17/02	35804
269	Romantique Limousine Statements	35805-36043
270	Disk containing surveillance photographs	36044
271	Disk containing Michael Devine autopsy photographs	36045

² The recordings and related linesheets were provided on August 25, 2011.

Please contact me if you have any questions or additional requests.

Very truly yours,

LORETTA E. LYNCH
United States Attorney

By: /s/
Samantha Ward
Paralegal Specialist
(718) 254-6142

cc: Clerk of the Court (SLT)